

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,

Plaintiff,

v.

ARROWOOD INDEMNITY COMPANY f/k/a
Royal Insurance Company also f/k/a Royal
Globe Insurance Company,

Defendant.

Case No: 20-CV-11011 (VEC)

NOTICE OF MOTION

**ARROWOOD INDEMNITY COMPANY'S NOTICE OF MOTION FOR LEAVE TO
AMEND ITS ANSWER**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law; the Declaration of Adam M. Smith, Esq. and exhibits thereto, and all other pleadings on file in this action, Defendant, Arrowood Indemnity Company, formerly known as Royal Indemnity Company, as successor by merger to Royal Insurance Company of America - improperly plead as ARROWOOD INDEMNITY COMPANY f/k/a Royal Insurance Company also f/k/a Royal Globe Insurance Company (“Arrowood”) - will move this Court, before the Honorable Valerie E. Caproni, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, at a date and time convenient for the Court, for entry of an order pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure granting Arrowood leave to file an amended Answer with Counterclaim, and for such other and further relief to which it may be entitled.

Dated: June 25, 2021
New York, New York

Respectfully submitted,

/s/ Adam M. Smith
Kevin T. Coughlin
Adam M. Smith
Karen H. Moriarty
COUGHLIN MIDLIGE & GARLAND LLP
Wall Street Plaza
88 Pine Street, 28th Floor
New York, New York 10005
Phone: 212-483-0105
Fax: 212-480-3899
E-mail: KCoughlin@cmg.law
ASmith@cmg.law
KMoriarty@cmg.law

Counsel for Arrowood Indemnity Company, formerly known as Royal Indemnity Company, as successor by merger to Royal Insurance Company of America

and

PORZIO, BROMBERG & NEWMAN, P.C.
Warren J. Martin, Jr.
Brett S. Moore
Christopher P. Mazza
156 West 56th Street, Suite 803
New York, NY 10019-3800
Phone: (212) 265-6888
Fax: (212) 957-3983
E-mail: wjmartin@pbnlaw.com
bsmoore@pbnlaw.com
cpmazza@pbnlaw.com

Co-Counsel to Arrowood Indemnity Company, formerly known as Royal Indemnity Company, as successor by merger to Royal Insurance Company of America